

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA *ex rel.*
RESOLUTE 3 LLC,

Plaintiff,

v.

LABQ CLINICAL DIAGNOSTICS, LLC; DART
MEDICAL LABORATORY, INC.;
COMMUNITY MOBILE TESTING INC.;
MOSHE LANDAU; DANIEL ADAR; JACOB
WEISS, and DOES 1-10,

Defendants.

No. 22 Civ. 751 (LJL)

UNITED STATES OF AMERICA, the STATE
OF NEW YORK, and the STATE OF NEW
JERSEY *ex rel.* NJ CHALLENGER LLC,

Plaintiffs,

v.

LABQ CLINICAL DIAGNOSTICS LLC et al.,
Defendants.

No. 22 Civ. 10313 (LJL)

UNITED STATES OF AMERICA,

Plaintiff-Intervenor,

v.

LABQ CLINICAL DIAGNOSTICS, LLC et al.,
Defendants.

No. 22 Civ. 751 (LJL)

No. 22 Civ. 10313 (LJL)

DECLARATION IN SUPPORT OF MOTION TO WITHDRAW AS COUNSEL

I, Michael L. Yaeger, declare under penalty of perjury pursuant to 18 U.S.C. § 1746, as follows:

1. I submit this Declaration pursuant to Local Rule 1.4 in support of the motion for Michael L. Yaeger to withdraw his appearance as counsel and attorney of record for Congregation Kolel Vyashkem Avrhom Inc. and NJJ Institutions (“Clients”) in the above-captioned action.

2. The motion is based on Clients’ failure to meet obligations to their lawyer. Counsel has made repeated attempts to resolve the issue, and continued representation would impose a financial hardship upon counsel. Clients have been notified of counsel’s intent to withdraw, and withdrawal can be accomplished without prejudice to Clients.

3. The case is currently in discovery and Clients have not yet decided whether to answer, move, or otherwise respond to the amended complaint. The Government has agreed in principle to extend Client’s time to answer, move, or otherwise respond to August 18, 2025, if (i) the resulting schedule includes the same amount of time between briefs as the current schedule, and (ii) the other defendants agree to that arrangement. The other defendants have agreed in principle to that arrangement.

4. I am not asserting a retaining or charging lien.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated: July 10, 2025
New York, New York

CARLTON FIELDS, P.A.

/s/ Michael L. Yaeger

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Inc. and NJJ Institutions*